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May 25, 2020

By ECF

Hon. Paul A. Engelmayer, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, New York 10007

Re: *Goat Fashion Limited v. 1661, Inc.*
Docket No. 1:19-cv-11045-PAE

Dear Judge Engelmayer:

This office represents plaintiff, Goat Fashion Limited (“Plaintiff”), in the above-referenced action. We write pursuant to Section 6(B) of Your Honor’s Individual Rules concerning redactions proposed for materials filed in connection with Plaintiff’s Reply Memorandum in Further Support of Plaintiff’s Motion for Preliminary Injunction and supporting declarations (filed simultaneously via ECF). Plaintiff seeks leave for the redactions indicated in the confidential materials emailed to the Court on this date.

The proposed redacted material in Exhibits 104, 105, and 107 includes personal information.

Plaintiff also seeks leave for several redactions based on defendant 1661, Inc.’s designation of certain items in Exhibits 98 and 115 to 119 as Confidential or Confidential – Attorneys’ Eyes Only pursuant to the parties’ Stipulated Confidentiality Agreement and Protective Order, dated April 20, 2020 (Dkt. 24). Defendant describes the confidential nature of the items proposed to be redacted as follows:

Confidential – Attorneys’ Eyes Only

1. Exhibit 98, 112:5-18
[references to confidential business/verification/authentication processes];
2. Exhibit 98, 222-226
[references to substances of investment discussions and highly

RUSKIN MOSCOU FALTISCHEK



Hon. Paul A. Engelmayer, U.S.D.J.

May 25, 2020

Page 2

- confidential agreement with investor Foot Locker]; and
3. Exhibit 115 to 119
[reveals identity of anonymous retail partners and highly confidential agreements]

Confidential

4. Exhibit 98, 118:10-11
[references to confidential, internal-facing packaging instructions];
5. Exhibit 98, 118:21 - 119:11
[references to confidential, internal-facing packaging instructions];
6. Exhibit 9 to Exhibit 98
[confidential packaging guidelines for internal use];
7. Exhibit 12 to Exhibit 98
[confidential packaging guidelines for internal use];
8. Exhibit 20 to Exhibit 98
[confidential document revealing demographic and other non-public information]; and
9. Exhibit 59 to Exhibit 98
[confidential, internal-facing brand guidelines]

The Declaration of Thomas A. Telesca, Esq., executed on March 25, 2020, has also been redacted in accordance with Defendant's designations.

Per Section 6(B), Plaintiff has filed materials bearing this confidential information in redacted, public form on ECF and has also provided the subject documents in unredacted form to the Court via email (in clean and highlighted versions).

Plaintiff has proposed redactions narrowly tailored to address each party's confidentiality concerns, proposing to redact only as much material necessary to protect the sensitive information described above. Plaintiff respectfully requests that the court approve these proposed redactions and files and maintain the unredacted copies under seal, pursuant to Section 6(B).

RUSKIN MOSCOU FALTISCHEK



Hon. Paul A. Engelmayer, U.S.D.J.

May 25, 2020

Page 3

We thank Your Honor for his time and consideration of this request.

Respectfully submitted,

Ruskin Moscou Faltischeck, P.C.

By: /s/ Thomas A. Telesca

Thomas A. Telesca

Attorney for Plaintiff

Cc: All counsel (by ECF)

Granted. Plaintiff is instructed to file these exhibits under seal electronically on ECF no later than June 2, 2020. For those exhibits that are too large to be filed, plaintiff should attempt to file them electronically on ECF in separate parts that are clearly labeled. If that is not possible, plaintiff must file the full versions of those exhibits under seal with the Clerk's office.

SO ORDERED.

A handwritten signature in blue ink that reads "Paul A. Engelmayer".

PAUL A. ENGELMAYER

United States District Judge

May 29, 2020

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